

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
This document relates to: <i>Katherine Dillaber, et al., v. Islamic Republic of Iran, et al.</i>	18-cv-03162 (GDB)(SN) ECF Case

**MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENT ON BEHALF OF
PERSONAL INJURY PLAINTIFF KATHERINE DILLABER**

PLEASE TAKE NOTICE that upon the accompanying declaration of Amanda Fox Perry, with exhibits, and the accompanying memorandum of law, Plaintiff Katherine Dillaber respectfully moves this Court for an Order awarding her (1) compensatory damages for pain and suffering in an amount commensurate with the injuries she sustained during the Terrorist Attacks on September 11, 2001, and in accordance with prior precedent in the U.S. District Court for the District of Columbia in similar cases, factoring in an upward departure on damages values based on the indelible impact of the Terrorist Attacks on September 11, 2001; (2) prejudgment interest at the rate of 4.96 % per annum, compounded annually for the period from September 11, 2001, until the date of the judgment; and (3) leave for Plaintiff Katherine Dillaber to seek punitive damages, economic damages, or other damages at a later date; and (4) for all other *Dillaber* Plaintiffs not included in this Motion to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiff Katherine Dillaber's request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran and the Iranian Ministry of Information and Security (collectively "the Iran Defendants") on October 22, 2019. See 18-cv-3162 (ECF No. 70).

Dated: August 17, 2021

Respectfully submitted,

/s/ Amanda Fox Perry

Amanda Fox Perry (*pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that Defendants Islamic Republic of Iran and Iranian Ministry of Information and Security could not be sent a copy of the Notice of Electronic Filing as they have not yet entered an appearance and appear not to have acknowledged other efforts to contact them in this case.

/s/ Amanda Fox Perry_____